

# Exhibit 22



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<p>1 forever and, you know, and eventually one day we 2 could run off and go live wherever -- on his 3 houseboat or whatever. 4 Q You said he would rub some kind of medicine -- Gold 5 Bond -- on your legs? 6 A It was Ben Gay -- 7 Q Okay. 8 A -- or Icy Hot. 9 Q All right. 10 A Just like soreness and stuff from all the sports 11 and that type of thing. And he'd like massage my 12 calves and my thighs. 13 Q Okay. Is that the only place he would put it? 14 A Yeah, I mean he wouldn't -- he didn't put it on my 15 genitals or anything. That -- that would burn; I'd 16 kind of know if he did that. But that's all I can 17 really remember. I mean I don't remember it being 18 on my shoulders or back. It was mainly my legs 19 because we did a lot of running and played soccer 20 and that type of stuff out there. We did a lot of 21 activities. 22 Q Where would he do that? 23 A In his room. And I do recall one time him doing it 24 in my room. 25 Q Did anybody see that?</p>	<p>1 only person I really like remember actually just 2 because of that story. I remember funny little 3 things like that. 4 Q Okay. 5 A But I didn't -- like I didn't spend hardly any time 6 with a lot of my campers. I was always with Arpaio 7 or with other, you know, other counselors. They 8 were kind of -- they would treat me a little bit 9 better because I -- he told everybody I was his 10 brother; I told everyone I was his brother. They 11 thought we were brothers and then -- excuse me -- 12 toward the end, he found out that they -- the 13 counselors found out that I wasn't really his blood 14 brother. 15 Q Uh-huh. 16 A They almost stopped talking to me altogether. 17 Q Okay. And you said that he gave you vitamins? 18 A That's -- that's what he said they were. I -- I 19 don't know what they were. 20 Q When did he do that? 21 A I guess right about the fourth or fifth day, I 22 guess, somewhere right about the first week, he 23 started giving them to me. Said that it'd help me 24 win the Mark Clark Award -- vitamins -- stay in 25 shape and that kind of stuff.</p>
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<p>1 A I think my camp -- my roommate was in there at that 2 time. 3 Q Who was your roommate? 4 A I don't remember his name. I didn't keep in 5 contact with him. I didn't keep in contact with 6 anybody. 7 Q Do you remember where your roommate was from? 8 A No. The only person I really -- I only -- the only 9 person I ever remember there besides, you know, the 10 people I went with really was the -- camper-wise, 11 you know -- was some guy we called [REDACTED] -- 12 Q Uh-huh. 13 A -- from [REDACTED]. We always called him [REDACTED] and 14 he's -- because I remember because he told some 15 weird story one time about almost getting attacked 16 by an alligator or something like that. And 17 [REDACTED] or whatever his name was -- [REDACTED] -- 18 and then he told me -- then I heard that he, like, 19 threw a lock at somebody or something like that and 20 busted their head open because he got angry or 21 something at one time. I know somebody got their 22 head busted open by a lock from a locker or 23 something like that. 24 Q Okay. 25 A And that's the only person honestly -- that's the</p>	<p>1 Q When did he do that? Where would he give it to 2 you? 3 A In his room at night. It -- it was -- it was 4 almost always at night. I don't really remember it 5 even happening when it was light. It was always at 6 night. 7 Q Did you ever stay -- did you ever sleep in his room 8 overnight? 9 A Oh, yeah. 10 Q How often did you do that? 11 A Oh, around ten times, give or take, you know, one 12 or two. I mean it was right around there. 13 Q Was anybody else in the room? 14 A I remember I think [REDACTED] staying in there also in 15 the same bed a night or two. I don't remember -- 16 it was -- I know it was at least two nights. I 17 don't know if he was in there, you know, also more 18 nights. Yeah, Rob would sleep in the room. He was 19 there; he wasn't there all the time, but when he 20 was there, he'd sleep in that room. He knew I was 21 -- I was sleeping in there with him. 22 Q Did anybody else know that you slept in that room? 23 A Oh, yeah, like it was, like, a big talk with 24 everybody that, you know, I get to sleep in Mike's 25 room. I bragged about that kind of in a way</p>

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<p>1 because almost for the fact that, you know as --</p> <p>2 Q Did any other --</p> <p>3 A -- it's cool to be his friend.</p> <p>4 Q Did any other counselors or staff members know that</p> <p>5 you slept in Mike's -- in Arpaio's room?</p> <p>6 A Well, see, here's the thing: Like I assume that my</p> <p>7 -- he's supposed to be in charge of my group -- I</p> <p>8 assume that he would have known, but I don't know</p> <p>9 because he didn't really care. They didn't really</p> <p>10 care where we were at.</p> <p>11 Q Okay.</p> <p>12 A There was really much -- not much supervision. I</p> <p>13 guess -- I guess even if he was really supervising,</p> <p>14 he -- he would have known I was in there.</p> <p>15 Q Okay.</p> <p>16 A And I guess if he wasn't supervising, then he</p> <p>17 wouldn't have known. So I don't -- I don't know.</p> <p>18 Q Okay.</p> <p>19 A I mean ██████ knew, of course.</p> <p>20 Q Yeah. Because he stayed in there with you?</p> <p>21 A Yeah. ██████ knew.</p> <p>22 Q Okay.</p> <p>23 A Excuse me.</p> <p>24 Q But as far as any counselors, you don't know that</p> <p>25 any of them knew?</p>	<p>1 "Full Metal Jacket" and stuff like that.</p> <p>2 Q What were the names -- do you remember the names of</p> <p>3 any of those movies other than "Full Metal Jacket"</p> <p>4 that you watched?</p> <p>5 A No. It didn't have a -- it was just a black tape</p> <p>6 in his backpack under the bed. It was unzipped and</p> <p>7 you saw like a bottle of Jack Daniels and like a</p> <p>8 cigar box or something in there and then you seen a</p> <p>9 tape inside of a brown like a little paper bag and</p> <p>10 that's what that tape was. And, at first, we had</p> <p>11 found that without -- without it being -- without</p> <p>12 him knowing about it. And we put it into the VCR -</p> <p>13 - me and ██████ -- and started watching it. He was</p> <p>14 outside doing the -- raising the flag, assembly-</p> <p>15 thing where they have like this little shotgun</p> <p>16 thing where they pull it and it goes boom like a</p> <p>17 big cannon noise.</p> <p>18 Q Uh-huh.</p> <p>19 A He was out there doing that thing. And that's when</p> <p>20 we found it and we had started watching it. Well,</p> <p>21 he caught us watching it somehow. And he -- we</p> <p>22 thought he was going to get real mad at us. And</p> <p>23 after that, like, he'd go -- it was -- it just</p> <p>24 became a normal thing. He just stuck it in after</p> <p>25 that one day and we just always -- always watched</p>
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<p>1 A I know Rob knew for sure because he was staying</p> <p>2 there. And I think ██████ knew. ██████ would see us</p> <p>3 in there, you know, laying in the bed and that type</p> <p>4 of thing and always -- always in and out of there.</p> <p>5 That ██████, see, he didn't like me for</p> <p>6 some reason and I never really knew why. But Mike</p> <p>7 told me some story about he knew him when he was</p> <p>8 younger or something like that.</p> <p>9 Q You don't know that ██████ knew; you just</p> <p>10 know that they saw you in the room at times?</p> <p>11 A Yeah, they saw me in the room. They saw me laying</p> <p>12 in the bed with him.</p> <p>13 Q Okay. But you said you laid in the bed with him</p> <p>14 during the day?</p> <p>15 A And -- and -- and at night. I mean like they would</p> <p>16 come in late at night and stuff. I mean counselors</p> <p>17 were up, stirring, all hours of the night.</p> <p>18 Q Okay.</p> <p>19 A I mean they were -- they would come in, you know,</p> <p>20 middle of the night. I didn't -- you know, we</p> <p>21 stayed up and we'd watch, you know, movies. And we</p> <p>22 had to watch, you know, the same pornography stuff</p> <p>23 a lot of the times.</p> <p>24 Q Do you -- do you --</p> <p>25 A But we'd have to watch other movies, too, like</p>	<p>1 it. And then from there on it was really no</p> <p>2 question about it or anything. He never got mad.</p> <p>3 He didn't say, "So, do you want to watch it?" He'd</p> <p>4 just put it on and we watched it.</p> <p>5 Q So that -- it was only one tape --</p> <p>6 A Yeah, there was only one tape.</p> <p>7 Q -- that y'all watched --</p> <p>8 A Yeah.</p> <p>9 Q -- over and over again?</p> <p>10 A There was only one tape, but I think it had like</p> <p>11 over eight hours or something like on there or 800</p> <p>12 minutes or something like that. I don't remember.</p> <p>13 But it was one tape that we watched over and over.</p> <p>14 And, you know, not all the time that we could sit</p> <p>15 there and watch for an hour straight either, you</p> <p>16 know, but. . .</p> <p>17 MR. ELLIOTT: I'm going to take a break about</p> <p>18 one and come back about one-thirty.</p> <p>19 MR. BRANDENBURG: Well, we can take a break</p> <p>20 now, if you want to.</p> <p>21 MR. ELLIOTT: It doesn't matter. Whatever</p> <p>22 y'all want to do.</p> <p>23 MR. BRANDENBURG: That's fine.</p> <p>24 (Off the record from 12:42 p.m.</p> <p>25 until 1:35 p.m.)</p>

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1 THE EXAMINATION BY MR. BRANDENBURG CONTINUES.  
2 Q We're back from our lunch break. ██████, did you  
3 have any conversations with your attorneys during  
4 the lunch break?  
5 A I said nothing or heard nothing, you know,  
6 regarding this case whatsoever.  
7 Q You mentioned that one -- the name of one of the  
8 movies that you watched in Arpaio's room was "Full  
9 Metal Jacket." Do you remember the name of any of  
10 the other movies that you watched?  
11 A Not really, no.  
12 Q The pornographic tape that you say that you  
13 watched, do you remember whether it had a title on  
14 it?  
15 A No. I told you already, no.  
16 Q Did a title come up on the screen when you put the  
17 video in?  
18 A No.  
19 Q Was there one movie on that or was there more than  
20 one movie on that tape?  
21 A I don't know. Oh, you mean like length? No, there  
22 was a bunch of, like, different, I guess different  
23 -- it'd be like one for 20 minutes or so, and then  
24 of course another one. It just went right into the  
25 other one. It, you know, it didn't come up with a

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1 title and say anything or anything that I remember.  
2 It just went from one, then all of a sudden, it'd  
3 go black screen, then it'd show like the beginning  
4 of another pornography, you know.  
5 It could be like, you know, for instance like  
6 a nurse, you know, and some guy saying, you know,  
7 he's like laying in a hospital bed and this starts  
8 the whole theme. And it'll go into something like  
9 that. No titles that I remember.  
10 Q Was -- I mean were these actual -- was there a  
11 plot? It sounds like this is just a series of just  
12 short films of people having sex. Is that what it  
13 was?  
14 A Yeah, it showed people having sex on there. I mean  
15 it was -- I don't know what you mean by "plot."  
16 Q Okay. Well -- and I mean, the movie, "Full Metal  
17 Jacket," has a plot.  
18 A That's a story line.  
19 Q Has a story, yeah. Was there a story in the porn -  
20 - in the tape that had the pornography on it?  
21 A No, it was like -- like little plays almost, you  
22 know. It'd be like a little play. Like it'd start  
23 off -- and they weren't very long, like 20 minutes.  
24 Like little plays, like I said. There'd be like a  
25 nurse talking to a guy that's supposedly hurt and

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1 then all of a sudden, you know, they may say  
2 something like, "So, if I rub it like this, does it  
3 feel better?" And then all of a sudden, it kind of  
4 goes into like into a sexual act and it'll start  
5 going into oral sex and then, of course, it goes  
6 into actual sexual intercourse, vaginally and then  
7 it'd be anally. And then, of course, he'd like  
8 either ejaculate on her body somewhere or -- or you  
9 know something like that. They weren't all the  
10 same, they were all different. And that's - that's  
11 all I really remember. But there was a bunch of  
12 them. It wasn't like a one, you know, eight-hour  
13 video of just like one movie, no, not at all.  
14 Q Did y'all watch the same little play every time?  
15 A No. It -- we -- but we had to -- we'd start that  
16 movie over and had to watch it again. Because  
17 there's no way that -- unless he had a different  
18 one -- I only seen one video and I know that we  
19 watched it little bits by little bits the whole  
20 time like all the way through.  
21 And I mean it may have been rewound and watch  
22 some of the same stuff. There was a bunch of them  
23 on there. You know, it's not like you really  
24 remember -- at least at that time I probably would  
25 remember seeing it, you know. "I saw this one,"

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1 you know, "the other day," or something like that,  
2 but, as of now, there's -- I don't remember that.  
3 I just remember the -- the pornography stuff  
4 and that's all. I mean. . .  
5 Q Were there adults in the movie?  
6 A They looked of age.  
7 Q Were there --  
8 A I mean above the age of 18. In the State of ██████,  
9 that's an adult. So, I mean do they look above the  
10 age of 18? Yeah.  
11 Q Were there any children in it -- or what appeared  
12 to be children?  
13 A No.  
14 Q And do you know how many different plays there were  
15 on this?  
16 A No, sir.  
17 Q Okay. And did anybody ever see you watching that  
18 other than Arpaio? Or see you watching it with  
19 Arpaio?  
20 A I told you that people walked in and saw that. Rob  
21 Lyons had seen it. ██████ had seen it. So. . .  
22 Q Did Rob watch it -- watch it with you?  
23 A I told you no one actually -- actually sat down and  
24 watched it with us. They may have glimpsed at it  
25 and laughed and said, "Look at that," and walked

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1 out. But I already told you no one sat down and  
 2 watched it with us.  
 3 Q Okay. And when y'all watched it, where were y'all  
 4 sitting?  
 5 A We were -- it wasn't -- we weren't ever really  
 6 sitting unless I was -- you know, he was sitting  
 7 like, you know, and like his legs spread and I'd be  
 8 between his legs and he'd be like kind of holding  
 9 me, you know.  
 10 Q Okay.  
 11 A Most of the time it was laying down and he was like  
 12 really cuddling and spooning with me. And, like I  
 13 told you, pushing his erection into me or his  
 14 fingers or grabbing me or licking me or just  
 15 talking how much he loves me and I'm his little  
 16 brother and he'd do anything for me. Majority of  
 17 the time, it was laying down and it was -- and it  
 18 was like spooning and like the majority of the time  
 19 it was -- it was outside the covers. But there  
 20 were a few times it was under the covers, too.  
 21 Q Do you know if anyone ever saw you under the covers  
 22 with him?  
 23 A When people would walk in, they would see me laying  
 24 in this bed whether I had covers on or covers off.  
 25 Q Okay. But do you remember the names of any of the

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1 counselors?  
 2 A I told you I don't remember any of those names  
 3 besides the counselors that I've already told you.  
 4 Q And that was?  
 5 A Rob Lyons, [REDACTED], Michael Arpaio, [REDACTED]  
 6 [REDACTED]. And I think I mentioned  
 7 that [REDACTED] guy, but that name is more of a  
 8 familiar sounding name than actually put a face to  
 9 him.  
 10 Q Okay.  
 11 A But I just remember -- but I do remember the  
 12 description of another guy, but I don't know if  
 13 that was that [REDACTED] guy.  
 14 Q Okay. You came in on Saturday night or Saturday  
 15 afternoon and you said Rob Lyon picked you up and  
 16 brought you back to the campus. Tell me about the  
 17 next day. How was it that you knew when to get up  
 18 and what to do and where to go at that point?  
 19 A I really didn't.  
 20 Q Okay. What did you do that day?  
 21 A I believe that that first day was kind of getting  
 22 your clothes and uniforms and all that stuff. I  
 23 don't -- I don't really -- I couldn't tell you what  
 24 I did, you know, that whole day or even really the  
 25 next day, you know. I -- it's -- I don't -- I

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1 don't remember exactly what we did. You know, you  
 2 kind of remember like the highlights of when you go  
 3 somewhere.  
 4 Q Uh-huh.  
 5 A And my highlight was spending time with Mike Arpaio  
 6 and that's why I remember a whole lot about that.  
 7 Q Okay.  
 8 A And all the fun stuff that we got to do that I  
 9 didn't get to do, you know, when I was at home.  
 10 There's no way I'd ever be able to do any of that  
 11 kind of stuff. And so the fun stuff that I never  
 12 got to do before that was new --  
 13 Q Uh-huh.  
 14 A -- I mean that's why -- that's why I have, you  
 15 know, more knowledge of that kind of stuff because  
 16 anything that's fun or different or exciting to  
 17 you, is something you're going to remember.  
 18 Q Okay. Well, you had never been to a sports camp  
 19 before, though, had you?  
 20 A I told you that baseball camp; that's a sports  
 21 camp.  
 22 Q What baseball camp did you go to?  
 23 A [REDACTED] -- it was called -- it was called [REDACTED]  
 24 [REDACTED] Baseball Camp. And then one time it was  
 25 called [REDACTED] and then another time it

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1 was called [REDACTED]. It changed  
 2 names, but it was the same one whatever it was.  
 3 And there was another one in [REDACTED],  
 4 that I went to. The one in [REDACTED] -- it  
 5 was in the [REDACTED] where my mom -- my mom  
 6 taught at [REDACTED] which was a college in [REDACTED].  
 7 But they had multiple campuses; they had one in  
 8 [REDACTED] and they have one in [REDACTED]  
 9 where I live now.  
 10 Q Okay. Tell me the name of the baseball camps  
 11 again.  
 12 A Okay. [REDACTED].  
 13 Q How do you spell that?  
 14 A [REDACTED] -- I don't know. I don't know  
 15 how to spell it.  
 16 Q Okay. And where is that?  
 17 A It's in -- I think it's out like around [REDACTED] --  
 18 outskirts of [REDACTED] somewhere.  
 19 Q Okay. All right. What else?  
 20 A And then that [REDACTED].  
 21 Q How do you spell [REDACTED]?  
 22 A [REDACTED].  
 23 Q Okay. And where is that?  
 24 A It's in [REDACTED].  
 25 Q All right.

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